

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Kia L Ragland a/k/a Kia L. Birch a/k/a
Kia L. Waters a/k/a Kia L. Robinson a/k/a Kia
L. Fleming

Debtor,

American Heritage Federal Credit Union
Movant.

v.

Kia L Ragland a/k/a Kia L. Birch a/k/a Kia L.
Waters a/k/a Kia L. Robinson a/k/a Kia L.
Fleming

Debtor/Respondent,

Anthony Joel Birch
(Non-filing Co-Debtor),

Scott Waterman, Trustee
Additional Respondent.

BANKRUPTCY CASE NUMBER
20-14312-amc

CHAPTER 13

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

American Heritage Federal Credit Union has filed a Motion for Relief, with the Court for relief from the automatic stay.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

2. **If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the Motion, then on or before May 6, 2024 **you or your attorney must file a response to the Motion.** (see instructions on next page).

3. **A hearing on the Motion** is scheduled to be held on May 15, 2024, at 10:00 A.M. in Courtroom #4, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Suite 204, Philadelphia, PA 19107.

4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5400 to find out whether the hearing has been cancelled because no one filed a response.

6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

Filing Instructions

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.

8. **If you are not required to file electronically**, you must file your response at

United States Bankruptcy Court
Eastern District of Pennsylvania
900 Market Street, Suite 400
Philadelphia, PA 19107

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file your Response to the Motion, you must mail or deliver a copy of the Response to the Movant's attorney:

Christopher A. DeNardo 78447
LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
Phone: (610) 278-6800
Fax: (847) 954-4809

Date: April 19, 2024